

# Exhibit 8

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**From:** Igor Litvak <Igor@LitvakLawNY.com>  
**Sent:** Thursday, June 2, 2022 7:39 PM  
**To:** Laura Harris; Paul Weeks; Luke Roniger  
**Cc:** Andrew Michaelson; Sumon Dantiki; Matthew Bush  
**Subject:** Re: Rule 26(f) Report

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Laura, just because State Department's website has some note it doesn't make it so, we don't even know on what that is based on, that site has more errors and mistakes than you can imagine, we need something more authoritative. The case you sent me yesterday doesn't do a better job. For now my clients are insisting on conducting a deposition in Russia virtually, the discovery rules allow for that. Also as far as they and I know there is no prohibition against that in the Russian penal code, and although their Russian attorneys are working to find out the answer, I won't know it by tomorrow 12 pm. Therefore, unless you can point to a specific Russian statute that forbids it I really don't see a problem, especially since we are proposing for it to be done virtually, so you will be safe in US. If no other option then my clients would be willing to appear in Kazakhstan for the depos, but they are saying June is not possible, they can realistically make it happen sometime in the first half of July. They have not yet started the process of applying for international passports, but they can start it soon and expect to receive them within 3 to 4 months. In terms of what other countries they can travel to using their internal Russian passports, the list is very short, as far as we know its Abkhazia, Kirgistan, and South Ossetia. Kirgistan they are not willing to go to, other places are not really practical either. This leaves only Russia virtually or Kazakhstan in person as possible options. Lastly, please let me know if you had a chance to contact Magistrate Figueredo, thanks.

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**From:** Laura Harris <lharris@kslaw.com>  
**Sent:** Thursday, June 2, 2022 2:04 PM  
**To:** Igor Litvak <Igor@LitvakLawNY.com>; Paul Weeks <PWeeks@KSLAW.com>; Luke Roniger <LRoniger@KSLAW.com>  
**Cc:** Andrew Michaelson <amichaelson@kslaw.com>; Sumon Dantiki <sdantiki@kslaw.com>; Matthew Bush <mbush@kslaw.com>  
**Subject:** RE: Rule 26(f) Report

Igor,

It is clear that we cannot hold Defendants' depositions in Russia. See U.S. Dep't of State, Bureau of Consular Affairs, Russia Judicial Assistance Information, available at <https://travel.state.gov/content/travel/en/legal/Judicial-Assistance-Country-Information/RussianFederation.html> ("The Russian Federation does not permit the taking of voluntary depositions of willing witnesses in civil and commercial matters."). Nor is Belarus an appropriate forum due to the State Department's Level 4 "Do Not Travel" advisory for US citizens.

We're looking into whether Kazakhstan is a viable option, including whether we can arrange for in-person depositions at the US Embassy in Nur-Sultan. Can you confirm that your clients are willing and able to appear for depositions in Kazakhstan later this month? Is it correct that, as of today, your clients have not started the process of applying for an international passport? Finally, it is our understanding that internal Russian passports allow citizens to travel to places other than Belarus and Kazakhstan. Please provide a list of all the countries to which your clients can travel with their current internal passports.

Separately, the Court has ordered us to reach out to Magistrate Figueredo to arrange time with her in July or August. Please let me know whether you agree to our contacting Judge Figueredo today.

Thank you,  
Laura

---

**Laura Harris**  
*Partner*

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**Sent:** Thursday, June 2, 2022 9:08 AM

**To:** Paul Weeks <[PWeeks@KSLAW.com](mailto:PWeeks@KSLAW.com)>; Laura Harris <[lharris@kslaw.com](mailto:lharris@kslaw.com)>; Luke Roniger <[LRoniger@KSLAW.com](mailto:LRoniger@KSLAW.com)>

**Cc:** Andrew Michaelson <[amichaelson@kslaw.com](mailto:amichaelson@kslaw.com)>; Sumon Dantiki <[sdantiki@kslaw.com](mailto:sdantiki@kslaw.com)>; Matthew Bush <[mbush@kslaw.com](mailto:mbush@kslaw.com)>

**Subject:** Re: Rule 26(f) Report

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Laura and Paul,

I still believe that the deposition can be done in Russia, the case you sent is not dispositive on that issue and it's exactly clear exactly what it means, I will try to do further research on it today. My clients tell me there is no prohibition under the Russian law for them or for google to conduct deposition in Russia, we can do it virtually. As an alternative we propose a country of Belarus or Kazakhstan. These are the only options since my clients don't have International Russian passports to travel and getting one would take 3 to 4 months. In Russia people have two passports, internal and international, my clients only have internal passports, using their internal Russian passports they can only travel to those two countries.

Igor.

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**From:** Paul Weeks <[PWeeks@KSLAW.com](mailto:PWeeks@KSLAW.com)>  
**Sent:** Wednesday, June 1, 2022 5:40:27 PM  
**To:** Igor Litvak <[Igor@LitvakLawNY.com](mailto:Igor@LitvakLawNY.com)>; Laura Harris <[lharris@kslaw.com](mailto:lharris@kslaw.com)>; Luke Roniger <[LRoniger@KSLAW.com](mailto:LRoniger@KSLAW.com)>  
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**Subject:** RE: Rule 26(f) Report

Igor,

Please see the attached case.

Thanks,  
Paul

---

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**Cc:** Andrew Michaelson <[amichaelson@kslaw.com](mailto:amichaelson@kslaw.com)>; Sumon Dantiki <[sdantiki@kslaw.com](mailto:sdantiki@kslaw.com)>; Matthew Bush <[mbush@kslaw.com](mailto:mbush@kslaw.com)>  
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Laura, please email me that Russian law that makes it illegal to depose my clients in Russia, thank you.

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**Cc:** Andrew Michaelson <[amichaelson@kslaw.com](mailto:amichaelson@kslaw.com)>; Sumon Dantiki <[sdantiki@kslaw.com](mailto:sdantiki@kslaw.com)>; Matthew Bush <[mbush@kslaw.com](mailto:mbush@kslaw.com)>  
**Subject:** Re: Rule 26(f) Report

Your proposed changes are fine. Thanks.

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**Subject:** RE: Rule 26(f) Report

Thank you, Igor. I think we are close, but your revisions to Section C are not consistent with where we thought we left our discussion. We think it is important that both sides have the same obligations with respect to production format and preservation. In the interests of getting to an agreement, please let us know if you consent to the language below. If so, we will get this on file.

**Proposed Language for Section C:**

The parties anticipate that the scope of discovery will include Electronically Stored Information ("ESI"). The parties will request ESI in the form or forms that facilitate efficient review of ESI. The parties reserve all rights in this regard, but affirm their obligations under the Federal Rules of Civil Procedure, including as to the preservation of relevant evidence.

Thank you,  
Laura

---

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**Subject:** Re: Rule 26(f) Report

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Laura see attached, I adopted your proposed language as to Paragraph E and modified paragraph C. I also made a change to the time to file motion for summary judgment, I moved everything by a week back.

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**From:** Paul Weeks <[PWeeks@KSLAW.com](mailto:PWeeks@KSLAW.com)>

**Sent:** Tuesday, May 31, 2022 5:50 PM

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**Subject:** RE: Rule 26(f) Report

Thanks for your time earlier, Igor. Below please find a revised Section E -- intended to capture where we collectively landed on our call earlier. Please let us know if you have any further comments or revisions to this section.

We'll keep an eye out for your crack at revisions to Section C (regarding ESI) based on our call.

Thanks,  
Paul

=====

**E. Limitations on Discovery – Rule 26(f)(3)(E)**

The parties agree that the first phase of fact discovery will be limited as set forth herein. The parties reserve their respective rights to meet and confer regarding the scope of discovery to commence after the conclusion of the first phase of fact discovery, and prior to serving discovery requests beyond those contemplated by the first phase of fact discovery. Google's position is that any discovery after the first stage of fact discovery should be limited to the remaining factual issues identified by the Court in its Opinion and Order:

(1) Defendants’ claimed “lack [of] knowledge of the criminal schemes that Google alleges they control”; (2) Defendants’ claim that they “did not intend to target U.S. users”; and (3) Defendants’ claim that “user participation in their services is entirely legitimate and voluntary.” ECF 62 at 11. Defendants’ position is that any discovery after the first stage of fact discovery should not be so limited, and should include Google’s investigation of the Defendants, and any matters and issues related to the same.

=====

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**Subject:** Re: Rule 26(f) Report

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**A. Limitations on Discovery – Rule 26(f)(3)(E)**

The parties agree that all discovery should be limited to the remaining factual issues: (1) Defendants’ claimed “lack [of] knowledge of the criminal schemes that Google alleges they control”; (2) Defendants’ claim that they “did not intend to target U.S. users”; and (3) Defendants’ claim that “user participation in their services is entirely legitimate and voluntary.” ECF 62 at 11. The parties reserve their respective rights to return to the issue of whether to expand the scope of discovery after the conclusion of the first phase of discovery. This paragraph does not limit in any way Defendants right to discovery concerning Plaintiff’s investigation of the Defendants and any matters and issues related to the same.

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**From:** Laura Harris <[lharris@kslaw.com](mailto:lharris@kslaw.com)>  
**Sent:** Tuesday, May 31, 2022 3:52 PM  
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**Subject:** Re: Rule 26(f) Report

Thank you, Igor. We will send an invite for 4p.

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---

**From:** Igor Litvak <[Igor@LitvakLawNY.com](mailto:Igor@LitvakLawNY.com)>  
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**Subject:** RE: Rule 26(f) Report

Thank you, Igor. We are generally fine with your first and last proposed changes. We have some questions about your proposed changes to Sections C and E and think at this stage a quick phone call to discuss is the best path forward. Are you available now (or at some point in the next hour)? We can send along a calendar.



Separately, for planning purposes we'd like to discuss whether your clients intend to come to New York for in-person depositions, and if not, where they propose to make themselves available for in-person depositions.

Thanks,  
Paul

---

**Paul Weeks**  
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**Subject:** RE: Rule 26(f) Report

Thank you, Igor. Please send across the changes you wish to make. We are having trouble understanding the highlighting in the document attached to your email.

---

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Laura an Luke, the revised report is fine with few exceptions, my clients cannot agree to not oppose any potential motion for default judgment against Does, we haven't even seen the motion and you already want them to waive any right to oppose it, please take it out. Second, why we took out the paragraph about exchanging computers, I liked the initial version much better, can we keep it. Lastly, regarding protective orders, I added a language that we will do our best to reach an agreement on one, I think its better that way since we never know what might happen. See attached.

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**From:** Luke Roniger <[LRoniger@KSLAW.com](mailto:LRoniger@KSLAW.com)>

**Sent:** Tuesday, May 31, 2022 1:42 PM

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**Subject:** Rule 26(f) Report

Igor, please see attached for our proposed edits to the Rule 26 report. I've attached a clean version and a redline against your prior draft.

We're available for a call if you have any questions.

Thanks,  
Luke

---

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